

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

NICOLE VILLANUEVA,

Plaintiff,

v.

CHRISTIANA CARE HEALTH SERVICES, INC.

Defendant.

CA No. 04-258-JJF

AFFIDAVIT OF THOMAS S. BLOOM

THOMAS S. BLOOM, being first duly sworn, states the following;

1. My name is Thomas S. Bloom. I am over the age of eighteen (18) and of sound mind. I am competent to testify to matters reflected in this Affidavit.

2. I am a duly licensed attorney in good standing of the bar of the highest Court of the Commonwealth of Pennsylvania. I practice law with the law firm of Morgan, Lewis & Bockius LLP in its 1701 Market Street, Philadelphia, Pennsylvania 19103-2921 office.

3. Morgan, Lewis & Bockius, LLP has been retained by Christiana Care Health Services, Inc. ("Christiana Care"), the defendant in this action.

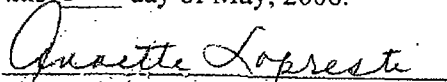
4. Pursuant to this Court's requirements, I hereby state that no genuine issues of material fact exist with regard to the facts argued in support of Christiana Care's Motion for Summary Judgment being filed in the above-referenced action on May 31, 2006.

This 30 day of May 2006.

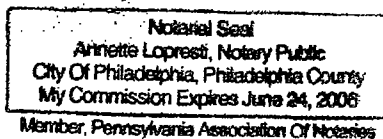


Thomas S. Bloom

Subscribed to and sworn before me
this 30th day of May, 2006.


Notary Public

My Commission Expires:



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C.A. No. 04-258-JJF

CERTIFICATE OF ELECTRONIC SERVICE

I hereby certify that on May 31, 2006, I electronically filed the attached **AFFIDAVIT OF THOMAS S. BLOOM** with the Clerk of Court using CM/ECF which will send notification of such filing(s) to the following:

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Dated: May 31, 2006

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Christiana Care Health Services, Inc.